

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 07-CR-30193-JPG
	)	
TARA PRINCE,	)	
	)	
Defendant.	)	

**DEFENDANT'S MOTION TO COMPEL GOVERNMENT  
TO DISCLOSE ITS EXPERTS**

Comes now Defendant, by her attorney, John D. Stobbs II, and for her Motion to Compel Government to Disclose Its Experts states:

1. On November 20, 2008, the Government filed with this Honorable Court its Response to Defendant Morgan<sup>1</sup> Request and Motion for Disclosure of Expert Testimony. [document 90]

2. In said Motion the Government promised to comply with the Federal Rules of Evidence and requested that Defendant's Motion be denied as moot.

3. Since filing of that Response, the Government has not identified any additional experts it expects to call nor has it complied with the Federal Rules of Evidence regarding disclosure of experts.

4. As part of its Response, insurance broker Ray Linzee was identified as an expert. The Government promised to "supplement the same with the summary required by Fed. R. Crim. P.16(a)(1)(G). It has not done so to date.

WHEREFORE, Defendant prays that this Honorable Court enter an Order requiring the Government to disclose its experts it intends to call at trial to Defendant.

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<sup>1</sup>Defendant is filing this date a Motion requesting that she be referred to by her married name "Prince" as opposed to her former name "Morgan."

TARA PRINCE

STOBBS LAW OFFICES

BY:

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2009 a copy of the attached *Motion to Compel Government to Disclose Its Experts* was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Mr. Steve Weinhoef  
Assistant U.S. Attorney  
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